

# United States District Court for District of Delaware

Do. Shaul Drungo

V

SGT William Muschel

ca. no. 1:14-cv-01135GMS

ca. no. 16-3308

## Motion for Appointment of Counsel

1. Plaintiff is Currently Proceeding Pro Se
2. Plaintiff's research, Affidavit's, Motion's, strategies discovered and/or discoverable Documents have been destroyed by the vicious, malicious and sadistic staff of DDC.
3. Plaintiff case has been vacated & remanded in which in the matter of Drungo v Brown entitles Plaintiff to Counsel
4. The Defendants have been exposed to intentionally withholding Documents and lying under the penalty of Federal perjury: i.e. the Guidance withheld and lied about that caused such Remand

5. Plaintiff seeks full discovery in which the defense is known for depriving and withholding.

6. The Plaintiff has established on the Record Grievances, Affidavits and also A sworn & verified Complaint which is Establishing 'Genuine material excuse' no Genuine factual material that exists to preclude a Summary Judgment

7. The Plaintiff also seeks A copy of the Entire Record for case No. 1:14cv-01135

Respectfully

Submitted

D. D. S. M.

4.17.17

**Certificate of Service**

I, De-Shawn Drungo<sup>SP</sup>, hereby certify that I have served a true  
and correct copy(ies) of the attached: Motion for Appointment  
of Counsel Upon the following  
parties/person (s):

TO: U.S. D.C  
844 N. King St  
Wilmington, DE  
19801

TO: U.S. C.A  
21400 U.S. Courthouse  
610 Market St  
Phila, PA  
19106-1790

TO: \_\_\_\_\_

TO: \_\_\_\_\_

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**BY PLACING SAME IN A SEALED ENVELOPE** and depositing same in the United States Mail at the James T. Vaughn Correctional Center, Smyrna, DE 19977.

On this 17 day of April, 2017  
De-Shawn Drungo